URS

October 17, 2012

Mr. W. Owen Thompson
Remedial Project Manager
Superfund Remedial Response Section Seven
U.S. EPA Region 5, SR-6J
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Subject: Submittal of Response to Comments Final Additional DNAPL Recovery Well Installation and Testing Work Plan
Detrex Source Control Area – Fields Brook Superfund Site
Detrex Corporation, Ashtabula, Ohio
Docket No. V-W-98-C-450

Dear Mr. Thompson:

On behalf of Detrex Corporation (Detrex), URS Corporation (URS) has prepared a Response to Comments Report for comments received from U.S. EPA on September 13, 2012 regarding the DNAPL Recovery Well Work Plan. As indicated in these responses, Detrex agrees with all of the comments and will submit a revised Work Plan to U.S. EPA. Also, as requested a detailed schedule of the testing plan will be prepared. At this time, we expect to submit the revised Work Plan and Schedule to U.S. EPA by November 1, 2012.

If you have any questions regarding this submittal, please do not hesitate to contact me at 216-622-2432 at your convenience.

Sincerely,

URS Corporation - Ohio

Martin L. Schmidt, Ph.D.
Vice President

Enclosure

cc: R. Currie – Detrex Corporation
T. Doll - Detrex Corporation
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DETREX CORPORATION RESPONSE TO UNITED STATES ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE ADDITIONAL DNAPL RECOVERY WELL INSTALLATION AND TESTING WORK PLAN
URS CORPORATION

On behalf of Detrex Corporation (Detrex), URS Corporation (URS) is responding to comments supplied by U.S. EPA's review of the *Additional DNAPL Recovery Well Installation and Testing Work Plan* that was submitted on August 24, 2012. The following are Detrex's responses to U.S. EPA's comments provided in the letter dated September 13, 2012.

While Detrex understands that U.S. EPA concurs with the Work Plan, URS will submit a more detailed schedule while moving forward with the project.

United States Environmental Protection Agency General Comment

U.S. EPA General Comment:
A more specific proposed schedule should be provided prior to the start of testing. Specifically, the schedule should discuss the order of the testing to be conducted. It is understood that this schedule may change based on weather and field results.

> ***Detrex Response to U.S. EPA General Comment:***
> *Detrex will prepare a more detailed schedule that provides the order of testing and monitoring for all recovery wells. At this time, Detrex/URS are obtaining prices from vendors for leasing testing equipment. Detrex will provide a detailed schedule to U.S. EPA by November 1, 2012.*

United States Environmental Protection Agency Specific Comments

U.S. EPA Comment No.1:
Section 1.2, Page 1-4
The text should be revised to state that in addition to evaluating the three different well designs, an additional objective of the testing is to obtain information needed to potentially design a remedial system using one (or more) of the well designs based on the results of the testing.

> ***Detrex Response to U.S. EPA Comment No. 1:***
> *Detrex agrees with this comment. The text will be revised to state that a remedial system using one or more of the well designs may be considered be used on results obtained.*

U.S. EPA Comment No. 2:
Section 2.3.1, Page 2-4
The text should be revised to state that after completion of the well inventory, either repairs will be performed on the wells (as needed) or a list of wells to be repaired (along with a reason for

selecting or not selecting a well for repair) will be provided. This approach will assist in maintaining a monitoring network at the site.

Detrex Response to U.S. EPA Comment No. 2:
Detrex agrees with this comment. The text will be revised to discuss procedures to be used on existing monitoring following the well inventory.

U.S. EPA Comment No. 3:
Section 2.3.2, Page 2-5
In addition to the data to be collected, the text should be revised to state that dense nonaqueous-phase liquid (DNAPL) inflow (return) data may require collection in a timeframe involving days or weeks after initial removal. DNAPL inflow (return) data would be useful in evaluating if DNAPL is present in the annulus space of a well (where it probably would inflow relatively quickly) or from surrounding soil (where inflow may require a longer time).

Response to U.S. EPA Comment No. 3:
Detrex agrees with this comment. The text will be revised to discuss procedures that will be used to collect DNAPL inflow return data during the testing period.

U.S. EPA Comment No 4:
Section 2.3.3, Page 2-6
Consideration should be given to measuring the contact angle and wettability of the DNAPL as well as the parameters specified. The information from these two additional parameters could be useful in evaluating the movement of DNAPL and in assisting in the design (U.S. Army Corps of Engineers 1999).

Detrex Response to U.S. EPA Comment 4:
Detrex agrees with this comment. DNAPL testing will include contact angle measurements and wettability of the DNAPL.

U.S. EPA Comment No 5:
Section 2.3.4, Figure 2-2
The general locations for the additional well testing shown in Figure 2-2 are acceptable. The general area for the recovery wells includes an area located outside the lagoon boundaries. However, based on best available information, it is recommended that the location of each recovery well for the lagoon area be within the limits of a former lagoon.

Detrex Response to U.S. EPA Comment 5:

Detrex agrees with this comment. During the geoprobe work completed on October 10 through 12, 2012 to identify recovery well locations, both U.S. EPA and Ohio EPA were present during this field work. Results from the geoprobe work indicated that the proposed testing areas were modified slightly both within the lagoon area and outside. The attached figure provides the location of the six (6) recovery wells that will be drilled on the site. The figure also shows proposed monitoring points. Also during the field work, the depth and length of the recovery well screens were agreed to.

U.S. EPA Comment No 6:
Section 2.3.4.3, Page 2-8

Based on the relatively small quantity of waste likely to be generated during installation of the recovery wells and monitoring points, consideration should be given to managing the investigation-derived waste (IDW) in a more mobile format, such as drums or other containers, than the soil management area proposed. Such an approach may facilitate full implementation of a remedial system by allowing soil and IDW to be easily moved out of the way.

Detrex Response to U.S. EPA Comment 6:

Detrex agrees with this comment. On October 5, 2012 URS submitted an email describing the planned DNAPL SMA Program to U.S. EPA. In this correspondence Detrex indicated that they preferred to use areas of the site to temporarily contain investigation derived waste (IDW). Due to the use of the sonic rig, the cuttings are expected to be extremely wet. During the kick-off meeting, Wednesday, October 10, 2012, locations for the IDW waste were provided to U.S. EPA and procedures for handling soils and water were agreed to.

U.S. EPA Comment No 7:
Section 2.3.4.3, Page 2-8

The management of IDW as outlined has been approved by the EPA. However, it is recommended that IDW be managed in a manner that will not prohibit the future installation of a remedial system(s) or component(s).

Detrex Response to U.S. EPA Comment 7:

Detrex agrees with this comment. See previous response.

U.S. EPA Comment No 8:
Section 2.3.5.2, Figure 2-6
For the testing area within the footprint of the former lagoon, the figure should include an additional probe location or two outside the former lagoon footprint to provide information regarding the effectiveness of recovery wells inside the lagoon on areas outside the lagoon. This information would be useful for any full-scale design.

Detrex Response to U.S. EPA Comment 8:

Detrex agrees with this comment. An additional probe location or two will be added to the monitoring well network outside the Former Lagoon footprint as requested.

U.S. EPA Comment No 9:
Section 2.3.5.2, Page 2-11, Bullets 1 through 5
In addition to the data proposed for collection, the vacuum at various locations (wellhead, vacuum pump, and monitoring probes) should be measured as well as the vapor/air flow rate through the vacuum pump.

The equipment proposed for the testing appears to be adequate for testing purposes. Consideration should be given to adding a low-permeability cover (such as a sheet of plastic similar to a painter's drop cloth) to reduce short circuiting if the data indicate that short circuiting is or may be occurring. Such a cover should be held down by gravel, sand bags, or equivalent means.

Detrex Response to U.S. EPA Comment 9a:

Detrex agrees with this comment. As requested, various locations (i.e., wellhead, vacuum pump and monitoring probes) will be measured for vacuum as well as vapor/air flow rate through the vacuum pump.

Detrex Response to U.S. EPA Comment 9b:

Detrex agrees with this comment. If data collected indicate that short circuiting is occurring, a low permeability cover will be positioned on the ground surface of the testing area, if needed.

U.S. EPA Comment No 10:
Section 2.3.7, Page 2-12

It is recommended that raw data (such as instrument readings, field notes, and operational notes) be submitted on a regular basis during the testing period. Data analysis is not required for the raw data, and can wait until preparation of the Technical Memorandum at the end of the testing.

Detrex Response to U.S. EPA Comment 10:

Detrex agrees with comment. As requested by U.S. EPA Detrex will submit raw data collected during the Pilot Test on a regular basis. During the testing period Detrex will submit weekly summary reports that contain field notes and operational notes to U.S. EPA.

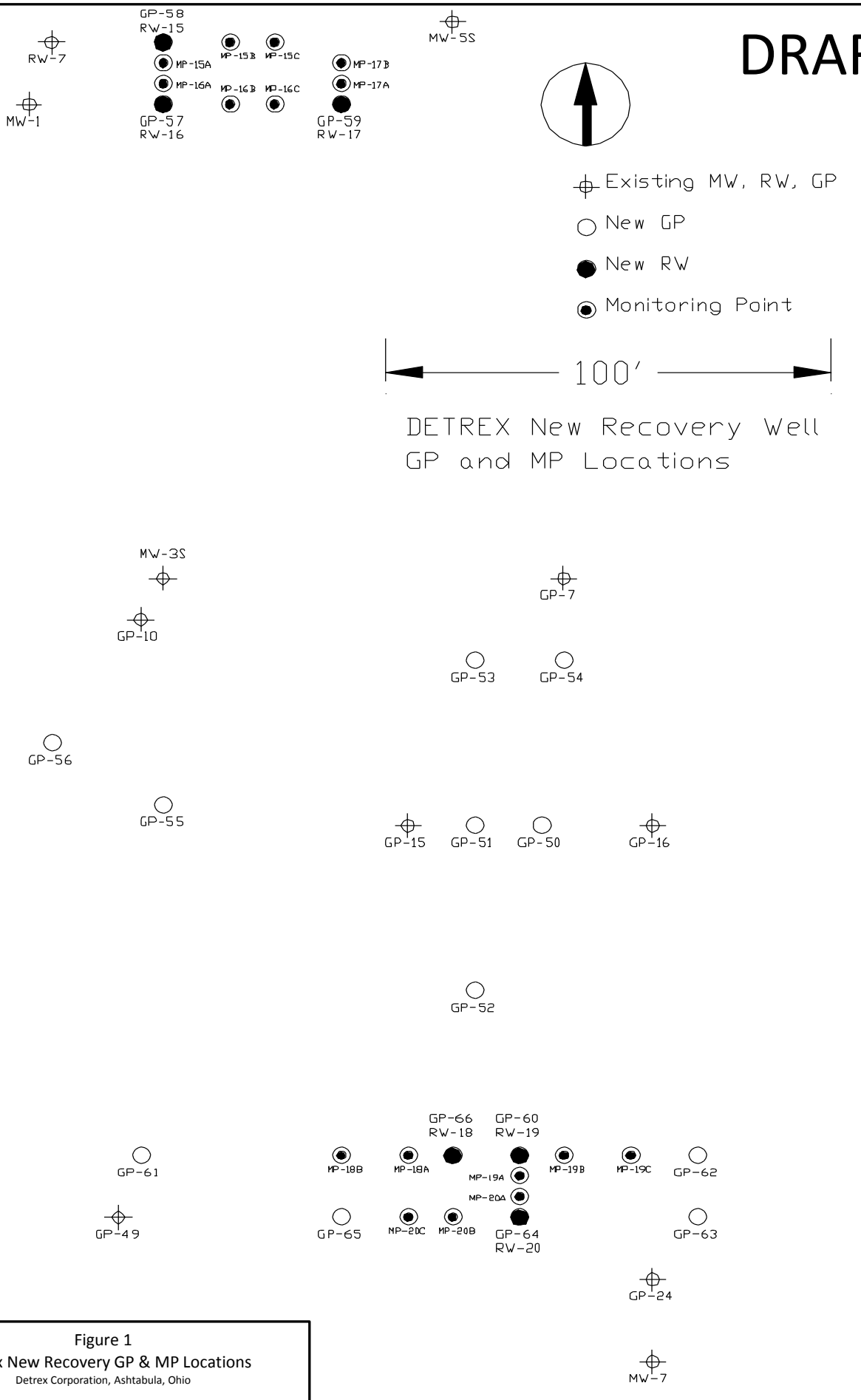

Figure 1
Detrex New Recovery GP & MP Locations
Detrex Corporation, Ashtabula, Ohio

URS Corporation

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